

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

MAY 21 1996

In the Matter of)
)
Implementation of the Local) CC Docket No. 96-98
Competition Provisions of the)
Telecommunications Act of 1996)

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COMMENTS IN SUPPORT OF BELL SOUTH'S MOTION
FOR EXTENSION OF TIME AND INCREASE IN PAGE LIMITS

Southwestern Bell Telephone Company ("SWBT"), by and through its attorneys, hereby files comments strongly supporting BellSouth's Motion for Extension of Time and Increase in Page Limits filed in this proceeding on May 21, 1996.

The experience of BellSouth regarding the difficulty of receiving copies of the comments is not unique. As of late Monday, May 20, 1996, SWBT had received the comments of only 60 parties, the same small number as BellSouth. The remaining parties' comments were not received by SWBT until early on Wednesday, May 22, 1996, a full five days after the filing date of May 17, 1996. Of the 14 day reply period established by the Commission, the parties have only the remaining 9 days to prepare reply comments. SWBT agrees with BellSouth's position that meaningful reply comments cannot reasonably be prepared in 9 short days.¹

¹ As NYNEX stated in its Motion for Extension of Time filed May 21, 1996, this short time period includes the Memorial Day holiday weekend.

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The issues and proposals are far too significant to the communications industry and its consumers to be decided based on reply comments prepared in such an abbreviated timeframe. Denying parties adequate time to read, analyze and prepare replies to more than 160 comments will result in a deficient record. The Commission's rules governing interconnection can withstand judicial review only if based upon a full and balanced record.

In addition to requesting an extension of time for filing reply comments, BellSouth also requests an increase in the page limits from 50 to 100 pages. SWBT also supports this request. It is imperative that all interested parties have the opportunity to participate fully in the reply comment cycle. An increase in page limits will allow the parties to fully respond to the numerous and varied proposals contained in the comments.

To ensure that a comprehensive record is developed, SWBT supports BellSouth's request for an additional 21 days to file reply comments and to increase the page limit for reply comments from 50 pages to 100 pages.

These slight modifications to the reply comment cycle will not prejudice any party, including the Commission. SWBT recognizes that the Commission is under severe time constraints in this matter, however, the Commission must ensure that it compiles an accurate and complete record before promulgating its rules. Granting BellSouth's motion will give

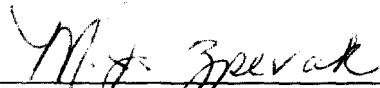
interested parties ample time and sufficient pages in which to reply to the comments filed.

Therefore, SWBT strongly supports BellSouth's Motion and urges the Commission to grant the requested extension of time and increase in page limits.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

By

A handwritten signature in dark ink, appearing to read "M. J. Zpevak", is written over a horizontal line.

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May 24, 1996

CERTIFICATE OF SERVICE

I, Kelly Brickey, hereby certify that the foregoing
Comments of Southwestern Bell Telephone Company has been filed
this 24th day of May 1996 to the Parties of Record


Kelly Brickey

May 24, 1996

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